Case 1:14-mj-00273-RHS Document 4 Filed 01/30/14 Page 1

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

JAN 3 0 2014

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN CLERK

UNITED STATES OF AMERICA,)		
Plaintiff,)))	CR No.	Kmj 273
vs.)		
Philip Moddeleni)		
Defendant.)		

MOTION FOR DETENTION HEARING AND CONTINUANCE

Pursuant to 18 U.S.C. § 3142(e) and (f), the United States moves the Court to conduct a detention hearing and thereafter order that defendant be detained prior to trial. As grounds for this motion, the United States asserts that the defendant is a flight risk and/or a danger to the community. Pursuant to 18 U.S.C. § 3142(f), the United States requests that the Court continue the detention hearing to a date that is no more than three days following the initial appearance, unless the Court finds good cause for further continuance.

Respectfully submitted,

STEVEN C. YARBROUGH Acting United States Attorney

KIMBERLY BRAWLEY Assistant U.S. Attorney

P.O. Box 607

Albuquerque, New Mexico 87103

(505) 346-7274